
**BROWN
KWON &
LAM LLP**

Brown Kwon & Lam, LLP
Attorneys at Law
521 Fifth Avenue, 17th Floor
New York, NY 10175
Tel.: (212) 295-5828
Fax: (718) 795-1642
Email: info@bkllawyers.com

Writer's Direct: clam@bkllawyers.com
(212) 295-5827

Via ECF

March 27, 2024

Hon. Dale E. Ho, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Santiago v. Umbrella Management LLC, et al.*
Case No.: 1:23-cv-2673 (DEH)(SLC)

Dear Judge Ho,

We represent Plaintiff in the above-referenced matter and write jointly with counsel for Defendants to request until April 5, 2024, to file the parties' settlement agreement for court approval. *See Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. Aug. 7, 2015).

Pursuant to the Court's previous Order, the parties' application for judicial approval is due on March 27, 2024. While the parties have worked to meet that deadline and the agreement has been finalized, we are still waiting for Defendants' execution of the settlement agreement before we file the settlement agreement for *Cheeks* review. This is the second request for an extension of time to file the settlement agreement for fairness.

Thank you for your time and consideration.

Respectfully Submitted,

/s/ Clara Lam
Clara Lam, Esq. (CL6399)

cc: All Parties via ECF

The status conference scheduled for April 2, 2024 is **CANCELLED**, given the parties' settlement.

The parties shall file their materials for judicial approval under *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 19 (2d Cir. 2015), by **April 5, 2024**.

The Clerk of Court is respectfully requested to close ECF No. 41.

SO ORDERED.



Dale E. Ho
United States District Judge
Dated: March 28, 2024
New York, New York